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STATE OF HAWAIL

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M. LIVICA

Attorneys for Plaintiffs Kelley Woodruff, M.D. and Hawaii Children's Blood and Cancer Group

# IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

## STATE OF HAWAII

KELLEY WOODRUFF, M.D. and	) Civil No. 02-1-0090-01 (BIA)
HAWAII CHILDREN'S BLOOD AND	) (Other Civil Action)
CANCER GROUP,	)
	) PLAINTIFFS' FINAL NAMING OF
Plaintiffs,	) WITNESSES; CERTIFICATE OF SERVICE
vs.	)
	)
HAWAI'I PACIFIC HEALTH;	)
KAPI OLANI MEDICAL SPECIALISTS;	)
KAPI OLANI MEDICAL CENTER FOR	)
WOMEN AND CHILDREN; ROGER	)
DRUE; FRANCES A. HALLONQUIST;	)
NEAL WINN, M.D.; SHERREL	)
HAMMAR, M.D.; DELOITTE &	)
TOUCHE LLP; DENNIS M. WARREN,	)
ESQ.; JOHN DOES 1-99; JANE DOES 1-	)
99; DOE ENTITIES 1-20; AND DOE	)
GOVERNMENTAL UNITS 1-10,	)
Defendants.	Trial: 10/3/05 Judge: Hon. Bert Isao Ayabe
	·

### PLAINTIFFS' FINAL NAMING OF WITNESSES

Plaintiffs Kelley Woodruff, M.D. and Hawaii Children's Blood and Cancer Group, by and through their attorneys, Jouxson-Meyers & del Castillo, hereby respectfully submit their Final Naming of Witnesses in the above-entitled matter.



#### I. Lay Witnesses

Plaintiffs may call the following lay witnesses to testify on their behalf at the trial of this matter:

- 1. Kelley A. Woodruff, M.D. c/o Arleen D. Jouxson-Meyers Rafael G. del Castillo Jouxson-Meyers & del Castillo, AAL, LLLC 302 California Ave., Suite 209 Wahiawa, Hawai'i 96786
- 2. Robert Wilkinson, M.D. c/o Arleen D. Jouxson-Mevers Rafael G. del Castillo Jouxson-Meyers & del Castillo, AAL, LLLC 302 California Ave., Suite 209 Wahiawa, Hawai'i 96786
- 3. Darryl Glaser, M.D. c/o Kapi`olani Medical Specialists 1319 Punahou Street Honolulu. Hawai'i 96826
- Desiree Medeiros, M.D. 4. c/o Kapi`olani Medical Specialists 1319 Punahou Street Honolulu, Hawai'i 96826
- 5. Wade Kyono, M.D. c/o Kapi`olani Medical Specialists 1319 Punahou Street Honolulu, Hawai'i 96826
- 6. Randy Wada, M.D. c/o Kapi`olani Medical Specialists 1319 Punahou Street Honolulu, Hawai'i 96826
- 7. Neal Winn, M.D. c/o Kapi`olani Medical Specialists 1319 Punahou Street Honolulu, Hawai'i 96826

- 8. Sherrel Hammar, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 9. Dianne Fochtman, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 10. Pamela Courtney, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 11. Kathy Hanai-Lee c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 12. Norella Brooks, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 13. Susan Young, RN c/o David Simons, Esq. 707 Richards Street, PH1 Honolulu, Hawai'i 96813
- 14. Carol Kotsubo, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 15. Henny Breen, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 16. Jean Quigby, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 17. Lori Conley

c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826

- 18. Jayne Thorp, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 19. Joyce Wong, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 20. Mary Gaughram, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 21. Julie Sestak, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 22. Dee Ann Omatsu, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 23. Judy Fadrowski, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 24.Richard Robel c/o Hawai`i Pacific Health 55 Merchant Street Honolulu, Hawai'i 96813
- Kathy Correa 25. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 26. Robert Ching c/o Kapi`olani Medical Center for Women and Children

- 1319 Punahou Street Honolulu, Hawai'i 96826
- 27. Lawrence O'Brien c/o Hawai`i Pacific Health 55 Merchant Street Honolulu, Hawai`i 96813
- 28. Roger Drue c/o Hawai'i Pacific Health 55 Merchant Street Honolulu, Hawai'i 96813
- 29. Frances Hallonquist c/o Hawai'i Pacific Health 55 Merchant Street Honolulu, Hawai'i 96813
- 30. Gail Lerch c/o Hawai`i Pacific Health 55 Merchant Street Honolulu, Hawai`i 96813
- 31. Dew Ann Langcoan c/o Hawai'i Pacific Health 55 Merchant Street Honolulu, Hawai'i 96813
- 32. Charles A. Sted c/o Hawai'i Pacific Health 55 Merchant Street Honolulu, Hawai'i 96813
- 33. Kenneth Blickenstaff c/o Deloitte & Touche LLP 1132 Bishop Street, Suite 1200 Honolulu, Hawai`i 96813
- 34. Carmen Wolf c/o Deloitte & Touche LLP 1132 Bishop Street, Suite 1200 Honolulu, Hawai'i 96813
- 35. Shigeko Lau, M.D.c/o Straub Clinic & Hospital888 South King Street1132 Bishop Street, Suite 1200

Honolulu, Hawai'i 96813

- 36. Michael Healy, M.D. Chief of Pediatrics, The Queen's Medical Center 1301 Punchbowl Street Honolulu. Hawai'i 96813
- 37. Walton Shim, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 38. Michael Sia, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 39. Allen Britten, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 40. Rodney Boychuk, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- Raul Rudoy, M.D. 41. Department of Pediatrics, John A. Burns School of Medicine Kapi'olani Medical Center for Women and Children 1319 Punahou Street, 7th Floor Honolulu, Hawai'i 96826
- 42.Carl Vogel, M.D. c/o Cancer Research Center of Hawai`i 1236 Lauhala Street Honolulu, Hawaii 96813
- 43. Robert Cooney, PhD c/o Cancer Research Center of Hawai`i 1236 Lauhala Street Honolulu, Hawaii 96813
- Brian Issel. M.D. 44. c/o Cancer Research Center of Hawai'i 1236 Lauhala Street

## Honolulu, Hawaii 96813

- Linda Rosen, M.D. 45. c/o Family Health Services Division, Dept. of Health 1250 Punchbowl Street, Room 258 Honolulu, Hawaii 96813
- Lynette Honbo, M.D. 46. c/o Jouxson-Meyers & del Castillo, AAL, LLLC 302 California Ave., Suite 209 Wahiawa, Hawaii 96786
- Richard Friedman, M.D. **4**7. c/o The Queen's Medical Center 1301 Punchbowl Honolulu, Hawai'i 96813
- 48. Robert Hee c/o The Queen's Medical Center 1301 Punchbowl Honolulu, Hawai'i 96813
- 49. Dewey Kim, Esq. c/o Arleen D. Jouxson-Meyers Rafael G. del Castillo Jouxson-Meyers & del Castillo, AAL, LLLC 302 California Ave., Suite 209 Wahiawa, Hawai'i 96786
- Designated witness(es) of AlohaCare 50. 1357 Kapiolani Blvd., **Suite 1250** Honolulu, Hawai'i 96814
- Designated witness(es) of Cancer Research Center of Hawaii 51. University of Hawaii 1236 Lauhala Street Honolulu, Hawai'i 96813
- 52. Designated witness(es) of John A. Burns School of Medicine University of Hawaii c/o Director of Administrative Services Legal Counsel Bachman Hall #207

2444 Dole Street Honolulu, Hawaii 96822

- 53. Designated witness(es) of The Queen's Health Systems 1099 Alakea Street Suite 1100 Honolulu Hawai'i 96813
- 54. Designated witness(es) of Queen's Medical Center 1301 Punchbowl Street Honolulu Hawai`i 96813
- 55. Designated witness(es) of Hawaii Medical Service Association 818 Keeaumoku Street Honolulu Hawai'i 96814
- Designated witness(es) of Hawaii Management Alliance 56. Association 737 Bishop Street **Suite 1200** Honolulu, Hawai'i 96813
- Designated witness(es) of University Health Alliance 57. 700 Bishop Street, 3rd Floor Honolulu, Hawai'i 96813
- 58. Designated witness(es) of Dept. of Health, State of Hawai'i 1250 Punchbowl Street Honolulu, Hawai'i 9681
- 59. Peter Locatelli, M.D. c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 60. Henry Yim, M.D. c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 61. Ken Ward, M.D. c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209

## Wahiawa, Hawai'i 96786

- 62. Marion Melish, M.D. c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 63. Ginger Osman c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- J. Russell Geyer, M.D. 64. c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 65. Mary Ann Lee c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 66. Bridgette Bourdoux, parent of Kai Wilkinson c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 67. Jennifer Colby c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 68. Nina Humphreys c/o Jouxson-Meyers & del Castillo 302 California Ave. Suite 209 Wahiawa, Hawai'i 96786
- 69. Sharon Powlison, RN c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street

Honolulu, Hawai'i 96826

- 70. Designated witness(es) of Medical Executive Committee **KMCWC** 1319 Punahou Street Honolulu, Hawaii 96826
- Designated witness(es) of Kaiser Foundation Health Plan, Inc. 71. c/o PHCS Hawaii, Inc. #1600 Pauai Tower 1001 Bishop Street Honolulu, Hawaii 96813
- Designated witness(es) of Hawaii Permanente Medical Group 72. c/o Shelley Young 2828 Paa Street, #2050 Honolulu, Hawaii 96819
- 73. Designated witness(es) of Hawaii Pacific Health c/o Kapi`olani Medical Center for Women and Children 1319 Punahou Street Honolulu, Hawai'i 96826
- 74. Designated witness(es) of Deloitte & Touche c/o John Komeiji, Esq. First Hawaiian Center 999 Bishop Street, 23<sup>rd</sup> Floor Honolulu, HI 96813
- 75. Dennis Warren, Esq. John S. Nishimoto, Esq. Pauahi Tower 1001 Bishop Street, Suite 2500 Honolulu, HI 96813

Plaintiffs reserve the right to name additional such lay witnesses or

Custodian(s) of Records by amendment to this Final Naming as the Court permits.

Plaintiffs reserve the right to call rebuttal witnesses, as necessary.

#### II. Expert Witnesses

David Eisenstadt 1. c/o Arleen D. Jouxson-Meyers Rafael G. del Castillo

Jouxson-Meyers & del Castillo, AAL, LLLC 309 California Ave., Suite 209 Wahiawa, Hawai'i 96786

Plaintiffs reserve the right to name such additional expert witnesses by amendment to this Final Naming as the Court permits. Plaintiffs also reserve the right to name expert witnesses to testify upon the opinions offered by any expert witnesses Defendants name.

Dated: Honolulu, Hawai'i, June 8, 2005

ARLEEN D. JOUXSON

RAFAEL G. DEL CASTILLO

Attorneys for Plaintiff

Kelley Woodruff, M.D. and

Hawaii Children's Blood and Cancer Group

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Attorneys for Plaintiffs Kelley Woodruff, M.D. and Hawaii Children's Blood and Cancer Group

## IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

### STATE OF HAWAII

KELLEY WOODRUFF, M.D. and	) Civil No. 02-1-0090-01 (BIA)
HAWAII CHILDREN'S BLOOD AND	) (Other Civil Action)
CANCER GROUP,	)
	) CERTIFICATE OF SERVICE
Plaintiffs,	) [Final Naming]
vs.	)
	)
	)
HAWAI'I PACIFIC HEALTH;	)
KAPI`OLANI MEDICAL SPECIALISTS;	)
KAPI OLANI MEDICAL CENTER FOR	)
WOMEN AND CHILDREN; ROGER	)
DRUE; FRANCES A. HALLONQUIST;	)
NEAL WINN, M.D.; SHERREL	)
HAMMAR, M.D.; DELOITTE &	)
TOUCHE LLP; DENNIS M. WARREN,	)
ESQ.; JOHN DOES 1-99; JANE DOES 1-	)
99; DOE ENTITIES 1-20; AND DOE	)
GOVERNMENTAL UNITS 1-10,	)
	)
Defendants.	)
	)
	- <del>-</del>

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the document listed in the foregoing caption will be served on the following parties as follows:

KENNETH S. ROBBINS, ESQ. ( ) hand delivery 1st class mail DOUGLAS CHIN, ESQ. Robbins & Associates 2200 Davies Pacific Center 841 Bishop Street Honolulu, Hawai'i 96813

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Attorneys for Deloitte & Touche LLP

Dated: Honolulu, Hawai'i, June 8, 2005

ARLEEN D. JOUXSON

RAFAEL G. DEL CASTILLO

Attorneys for Plaintiff Kelley Woodruff, M.D. and Hawaii Children's Blood and Cancer Group